

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:24-CV-21463-ALTMAN/SANCHEZ

NEREYDA SUHEY CASTILLO MARENCO,

Plaintiff,

vs.

J.C. PAINTING CONTRACTOR  
LLC, MARIA GONZALEZ, AND  
TOMAS GONZALEZ,

Defendants.

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO FILE HER REPLY SUPPORTING  
HER MOTION FOR AN AWARD OF ATTORNEY'S FEES AND COSTS**

Plaintiff, Nereyda Suhey Castillo Marengo, through her undersigned counsel and pursuant to Fed. R. Civ. P. 12, Local Rules 7.1 and 7.3, and other applicable Rules and laws, requests the Court to grant an extension of time to file her Reply in support of her Motion for an Award of Attorney's Fees and Costs [ECF No. 38], based upon the lack of opposition and the following good cause:

1. Plaintiff filed her Motion for the Court to determine the attorney's fees to be awarded to her as the prevailing party on August 18, 2024 [ECF No. 38].
2. Defendants filed their Response in Opposition on August 28, 2024 [ECF No. 40].
3. Due to the press of business and emergent commitments that have arisen in other matters, the undersigned will be unable to analyze the issues Defendants raised in their Response [ECF No. 40] and to timely file her Reply thereto, requiring her to request an extension of time to file her Reply through Monday, September 9, 2024.

4. The undersigned contacted defense counsel, who had no opposition to providing an extension of time for Plaintiff to file her Reply by Monday, September 9, 2024.

5. Pursuant to Fed. R. Civ. P. 6(b)(1) “When an act may or must be done within a specified time, the court may, for good cause, extend the time: (A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires.”

6. This Court has the power to “control the disposition of the causes on its docket with economy of time and effort for itself, for counsel and for litigants.” *Landis v. North American Co.*, 299 U.S. 248, 254 (1936); *also see Clinton v. Jones*, 520 U.S. 681, 706-707 (1997).

7. Accordingly, Plaintiff respectfully requests the Court to grant her an extension of time until Monday, September 9, 2024, to file her Reply.

WHEREFORE Plaintiff, Nereyda Suhey Castillo Marengo, respectfully request the Court to grant her the Extension of Time requested above for good cause shown and the lack of opposition.

**LOCAL RULE 7.1 CERTIFICATION**

Counsel for the movant conferred with all parties or non-parties who may be affected by the relief sought in the motion in a good faith effort to resolve the issues raised in the motion and represents that defense counsel agreed to the relief requested above.

Respectfully submitted this 4th day of September 2024,

Brian H. Pollock, Esq.  
Brian H. Pollock, Esq. (174742)  
[brian@fairlawattorney.com](mailto:brian@fairlawattorney.com)  
FAIRLAW FIRM  
135 San Lorenzo Avenue, Suite 770  
Coral Gables, FL 33146  
Tel: 305.230.4884  
*Counsel for Plaintiff*